

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Andrea S. Boozer aka Andrea S Randolph  
Debtor(s)

CHAPTER 13

PENNSYLVANIA HOUSING FINANCE AGENCY  
Movant

vs.

NO. 19-14372 PMM

Andrea S. Boozer aka Andrea S Randolph  
Debtor(s)

Shawn Sloan

Co-Debtor

Kenneth E. West Esq.

Trustee

11 U.S.C. Sections 362 and 1301

**MOTION OF PENNSYLVANIA HOUSING FINANCE AGENCY  
FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362**

1. Movant is PENNSYLVANIA HOUSING FINANCE AGENCY.
2. Debtor(s) and Co-Debtor is/are the owner(s) of the premises 6453 N 17th St, Philadelphia, PA 19126, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$137,362.00 on the mortgaged premises that was executed by Debtor and Co-Debtor as co-mortgagors on February 28, 2014. The mortgage has been assigned as follows: FROM: Gateway Funding Diversified Mortgage Services, L.P., TO: Pennsylvania Housing Finance Agency, by assignment of mortgage dated February 28, 2014, and recorded in Philadelphia PA on March 07, 2014, as Doc ID 52757306.
4. Kenneth E. West Esq., is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$1,090.97 for the months of August 2021 through November 2021, \$1,096.77 for the months of December 2021 through November 2022, and \$1,090.78 for the months of December 2022 through June 2023, less suspense of \$86.09 plus late charges if applicable.

7. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

8. The total amount necessary to reinstate the loan post-petition is \$25,074.49 (plus attorney's fees & costs).

9. Co-Debtor, Shawn Sloan, who has not filed for Bankruptcy in this case, is liable on the mortgage loan secured by the aforesaid mortgage together with the Debtor.

10. Movant is entitled to relief from stay for cause.

11. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Michael P. Farrington

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